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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Bankruptcy Case No. 19-30088 (DM)

In re:

Chapter 11
(Lead Case) (Jointly Administered)

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

**DECLARATION OF KEVIN J. ORSINI IN
SUPPORT OF MOTION OF DEBTORS
PURSUANT TO 11 U.S.C. §§ 502(b)(9) AND 105(a),
FED. R. BANKR. P. 2002, 3003(c)(3), 5005, AND
9007, AND L.B.R. 3003-1 FOR ORDER (I)
ESTABLISHING DEADLINE FOR FILING
PROOFS OF CLAIM, (II) ESTABLISHING THE
FORM AND MANNER OF NOTICE THEREOF,
AND (III) APPROVING PROCEDURES FOR
PROVIDING NOTICE OF BAR DATE AND
OTHER INFORMATION TO ALL CREDITORS
AND POTENTIAL CREDITORS**

Date: May 22, 2019

Time: 9:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Pursuant to 28 U.S.C. § 1746, I, Kevin J. Orsini, hereby declare as follows under penalty of
2 perjury:

3 I am a partner of Cravath, Swaine & Moore LLP (“**Cravath**”), a New York law firm with
4 offices at 825 Eighth Avenue, New York, New York 10019. I am an attorney at law licensed to
5 practice in the State of New York and also admitted to practice before this Court *pro hac vice*.

6 Cravath is counsel to PG&E Corporation and Pacific Gas and Electric Company
7 (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter**
8 **11 Cases**”). I submit this Declaration in support of the *Motion of Debtors Pursuant to 11 U.S.C.*
9 *§§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1*
10 *for Order (i) Establishing Deadline for Filing Proofs of Claim, (ii) Establishing the Form and*
11 *Manner of Notice Thereof, and (iii) Approving Procedures for Providing Notice of Bar Date and*
12 *Other Information to all Creditors and Potential Creditors*, filed on the date hereof (the “**Bar Date**
13 **Motion**”).¹

14 Prior to the commencement of the Chapter 11 Cases, Cravath was the Debtors’ lead counsel
15 for, among other things, litigation and regulatory matters related to the wildfires that occurred in
16 Northern California in 2017 and 2018. Cravath represented PG&E in connection with the
17 prepetition lawsuits and claims related to the 2017 and 2018 Northern California Wildfires since
18 the initial filing of those suits. Subject to this Court’s approval, Cravath has been retained to advise
19 and represent the Debtors in the Chapter 11 Cases with respect to, among other things, (i) litigation
20 matters relating to the 2017 and 2018 Northern California Wildfires as well as the 2015 Butte
21 Wildfire (collectively, the “**Northern California Wildfires**”), (ii) claims allowance, claims
22 estimation, and related settlement and plan of reorganization matters with respect to Wildfire
23 Claims, and (iii) investigation and inquiries by regulators and prosecuting authorities related to the
24 Northern California Wildfires, and advising the Debtors in connection with wildfire issues that have
25 arisen or may arise in connection with their criminal probation from the San Bruno gas explosion.

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28 ¹ Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such
terms in the Bar Date Motion.

1 In connection with the Debtors' preparation of Schedule E/F, which was filed on March 14,
2 2019 [Dkt. Nos. 900, 906], Cravath provided the Debtors with a list of all complaints related to the
3 2017 and 2018 Northern California Wildfires. I understand that Schedule E/F also incorporates a
4 list of all complaints that had been filed related to the 2015 Butte Wildfire and a list of individuals
5 who may have contacted or corresponded with the Debtors through their claims management
6 process regarding potential Wildfire Claims but who had not yet commenced formal litigation at
7 the time of correspondence. The list of Wildfire Claims set forth in Schedule E/F reflects
8 approximately 13,700 individual Known Wildfire Claimants.

9 In addition to complaints that have been filed, I along with my colleagues at Cravath have
10 identified sources in the possession of third parties that may provide Debtors with additional contact
11 information, including mailing addresses, of holders of Wildfire Claims: (i) a database maintained
12 by BrownGreer PLC, which lists persons or entities that have Wildfire Claims in connection with
13 the prepetition State court litigation related to the 2017 Northern California Wildfires; (ii) contact
14 information maintained by the subrogation insurance carriers for persons or entities that have filed
15 insurance claims or have received payment under any insurance policy for damages arising out of
16 or relating to a Wildfire Claim; and (iii) the GIS database managed by Northwest Aerial
17 Reconnaissance, Inc., experts retained by Debtors in connection with prepetition State court
18 litigation, which contains a list of all properties and property owners located within the 2017
19 Northern California fire perimeters. In connection with the Bar Date Motion and the noticing
20 procedures contemplated therein, the Debtors have made or will soon make requests to the
21 appropriate parties for access to the information contained in the above-mentioned sources.

22 Additionally, as set forth in the Bar Date Motion, the Wildfire Claimant Proof of Claim
23 Form and Wildfire Subrogation Claimant Proof of Claim Form proposed by the Debtors request
24 information I believe is important relating to the Wildfire Claims, including information to identify
25 the relevant wildfire, the specifics of the type of loss or injury, the location of the loss or injury, the
26 type of damages asserted, and (if applicable) whether the claim is covered by insurance and the
27 details with respect thereto. I believe the information being requested is critical to assessing the
28 Debtors' aggregate liability, overall and for different categories of claims. For instance, identifying

1 the relevant fire and the location of the loss or injury is necessary to ensure that liability findings
2 made with respect to the individual fires are carried through to the corresponding claims.
3 Information concerning the types of damages asserted is required to enable the Debtors and other
4 parties to calculate an accurate measure of damages. Identifying whether a claim has been covered
5 by insurance is required to value claims accurately and avoid any double-counting of losses
6 recovered across the different categories of claimants (*i.e.*, Wildfire Claimants and Wildfire
7 Subrogation Claimants). I believe that obtaining this information will be essential to the claims
8 estimation and resolution process whether the aggregate amount of liability relating to Wildfire
9 Claims is established consensually—as is the Debtors’ hope—or otherwise. I further believe the
10 information being requested is limited and has been tailored and organized in a streamlined manner
11 so that providing the same will not impose any undue burden on any Wildfire Claimant.

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13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing
14 statements are true and correct.

15 [Signature page on next page]
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1 Dated: May 1, 2019
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4 /s/ Kevin J. Orsini
5 By: Kevin J. Orsini
6 Title: Partner, Cravath Swaine & Moore LLP
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